

*South Carolina State Conference of The NAACP, et al. v. Ellen Weaver in her official capacity as South Carolina Superintendent of Education, et al.*

Civil Action No.: 3:25-cv-487-SAL

# Exhibit C

**to Defendants Weaver's and Lexington County School District Three's Response in  
Opposition to Plaintiffs' Motion for a Preliminary Injunction**

**Declaration of Julie Ruff**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

SOUTH CAROLINA STATE CONFERENCE OF THE NAACP; IBRAM X. KENDI; AYANNA MAYES; MARY WOOD; T.R., a minor by and through their father and next friend, TODD RUTH-ERFORD; and J.S., a minor by and through their mother and next friend, AMANDA BRADLEY,

Plaintiffs,

v.

ELLEN WEAVER in her official capacity as South Carolina Superintendent of Education; LEXINGTON COUNTY SCHOOL DISTRICT THREE; and SCHOOL DISTRICT FIVE OF LEXINGTON & RICHLAND COUNTIES,

Defendants.

Civil Action No. 3:25-cv-487-SAL

**DECLARATION OF JULIE BURGESS RUFF**

I, Julie Burgess Ruff, declare pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Julie Burgess Ruff I am over the age of 18 and am competent to make this declaration. I am a citizen and resident of South Carolina. The facts stated herein are true of my own personal knowledge, and if called to testify, I would so testify.
2. I am the librarian at Batesburg-Leesville Elementary in Lexington School District Three where I have worked for approximately 10 years. Before that, I worked at Batesburg-Leesville Elementary and Gallman Elementary as a teacher for 11 years.
3. I have a Bachelor's degree in elementary education from Clemson University, a Master's degree in instructional technology from Grand Canyon University and a Master's degree in instructional technology with certification in school library media from Valdosta State University.
4. I have training and experience in the selection and evaluation of curricula and supplemental materials in the K12 educational context.

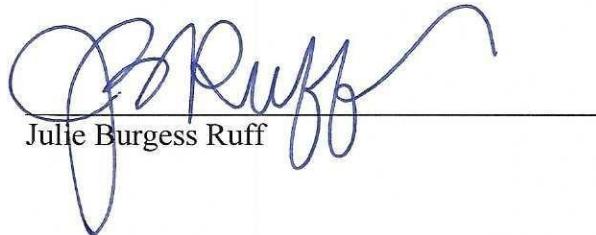
## Declaration of Julie Burgess Ruff

April 17, 2025

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5. I was a member of Lexington County School District Three's committee formed in November 2022 to review *Stamped: Racism, Antiracism, and You* ("Stamped") and recommend whether the District should include it in its libraries or media centers.
6. During my service on that committee, I read *Stamped* and evaluated its educational suitability, accuracy, objectivity, and validity.
7. In my role on the committee, I considered the rights and responsibilities of the District's students, parents, and teachers, and my own assessment of *Stamped*'s educational rigor and suitability.
8. At the conclusion of the committee's review, I voted to recommend that *Stamped* be removed from the District's libraries and media centers because of its lack of accuracy and objectivity. The other committee members agreed with that recommendation.
9. The committee's recommendation and my vote were motivated by the fact that *Stamped* is a non-fiction book that, in our view, included assertions or descriptions of particular historical facts or events that were inaccurate or incomplete and that these errors of omission or commission meant the book lacked the educational and academic rigor to be suitable for use in an educational setting.
10. I do not object to District Three's classrooms and libraries containing books about race, racism, slavery, civil rights, social justice, or the black experience in America if those books are accurate, objective, valid, and educationally suitable.
11. My vote to recommend the removal of *Stamped* from District Three's libraries and media centers was motivated by my view that the book lacked the necessary accuracy, validity, and objectivity, not by my opposition to or disagreement with the subject matter of the book or the authors' viewpoints.
12. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 17th day of April, 2025.

  
Julie Burgess Ruff